

## **EXHIBIT 266**

VINCENT FRAZER  
U.S. VIRGIN ISLANDS vs JP MORGAN CHASE

July 13, 2023

1

1 UNITED STATES DISTRICT COURT FOR THE

2 SOUTHERN DISTRICT OF NEW YORK

3 CASE NUMBER: 22-CV-10904-JSR

4 ACTION FOR DAMAGES

5 GOVERNMENT OF THE UNITED STATES )  
6 VIRGIN ISLANDS, )

7 Plaintiff, )

8 VS. )

9 JP MORGAN CHASE BANK, N.A., )

10 Defendant. )

11 -----

12  
13  
14  
15 VIDEO RECORDED DEPOSITION OF

16 VINCENT FRAZER

17 THURSDAY, JULY 13, 2023

18  
19  
20 REPORTED BY:

21 DENISE D. HARPER-FORDE  
22 Certified Shorthand Reporter (CSR)  
23 Certified RealTime Reporter (CRR)  
24 Certified LiveNote Reporter (CLR)  
25 Registered Professional Reporter (RPR)  
Notary Public (FLORIDA)

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1 ATTORNEY ACKERMAN: Object to  
2 form.

3 THE WITNESS: Sorry.

4 ATTORNEY ACKERMAN: Go ahead  
5 and give your answer.

6 THE WITNESS: No.

7 (BY ATTORNEY NEIMAN) :

8 Q. Okay. After you became  
9 Attorney General in 2007, what do you  
10 recall of the nature of any matters  
11 relating to Mr. Epstein that you dealt  
12 with?

13 A. The only matters I dealt with  
14 Mr. Epstein was when he was required  
15 to register on the Virgin Islands  
16 sexual offender registry, and his  
17 counsels made requests for certain  
18 accommodations in terms of his  
19 reporting requirements.

20 Q. Well, who was his counsel?

21 A. His counsel was Maria Hodge,  
22 co-counsel, and Daniel sic Indyck --  
23 Indyke I believe is his name, were the  
24 lawyers.

25 Q. Okay. And we'll get into this

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1 Q. Do you remember there being a  
2 time when you were just having phone  
3 calls back and forth, and there was  
4 reluctance to have something in  
5 writing related to Mr. Epstein?

6 A. No, I don't recall it.

7 Q. All right. Now the topic, if  
8 you look up in the next E-mail up in  
9 the chain between Mr. Epstein and Ms.  
10 De Jongh, you see there's a reference  
11 to an interstate compact and about who  
12 will supervise probationers. Do you  
13 see that?

14 ATTORNEY ACKERMAN: Object to  
15 form.

16 THE WITNESS: Okay. I see  
17 what -- I see the reference to  
18 compact.

19 (BY ATTORNEY NEIMAN):

20 Q. All right. Do you have any  
21 recollection of any discussion related  
22 to the supervision of Mr. Epstein  
23 being transferred from Florida to the  
24 Virgin Islands?

25 A. No, I don't.

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1 Q. If you look at the next E-mail  
2 up in the chain, you'll see that it's  
3 from Ms. De Jongh on April 9th at 9:18  
4 A.M. Ms. De Jongh writes, "Thanks.  
5 Sending again to John. Vincent is off  
6 island and government closed for  
7 Easter weekend until Tuesday. Can you  
8 believe it? John will E-mail to  
9 Vincent."

10 Do you see that?

11 A. Yes, I see it.

12 Q. Any recollection of Mr. De  
13 Jongh E-mailing something related to  
14 the interstate compact and Mr. Epstein  
15 to you?

16 A. No.

17 Q. Did you have both a work  
18 E-mail and a personal E-mail in this  
19 time period, 2009?

20 A. Probably did.

21 Q. And what was your personal  
22 E-mail in that time period?

23 A. Vinfra@msn.com.

24 Q. Do you still have access to  
25 that E-mail account?

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1 they -- I no longer have access to  
2 those accounts.

3 (BY ATTORNEY NEIMAN) :

4 Q. Okay. And you don't recall  
5 what the E-mail addresses were?

6 A. No.

7 Q. All right.

8 A. Why?

9 Q. What's that?

10 A. Oh, okay. I thought you asked  
11 me why.

12 Q. No. No, no. If you don't  
13 recall, you don't recall.

14 Do you know whether Ms. De  
15 Jongh or Mr. De Jongh ever E-mailed  
16 you on your personal E-mail address?

17 A. I don't believe it is very  
18 likely I -- that Governor De Jongh may  
19 have because we were friends before he  
20 was Governor. It's not likely I would  
21 have any E-mails from Cecile de Jongh  
22 regarding this topic. I don't believe  
23 there would be.

24 Q. Let me just make sure I  
25 understand your answer. You do

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1 worked out between Darren, Maria  
2 Carbon and Anderson."

3 Do you see that?

4 A. Yes.

5 Q. As do you have any reason to  
6 doubt, sir, that there was a  
7 compromise amendment that the Attorney  
8 General's Office could support that  
9 was worked out by Darren, Maria Carbon  
10 and Anderson?

11 ATTORNEY ACKERMAN: Objection  
12 to form.

13 THE WITNESS: Yes.

14 (BY ATTORNEY NEIMAN):

15 Q. I'm sorry. Yes, you have  
16 reason to doubt or --

17 A. No. I don't doubt it that --  
18 that there was a compromise as to the  
19 acceptable amendment.

20 Q. Right. So there was a  
21 compromise worked out as to an  
22 acceptable amendment between the  
23 counsel for Mr. Epstein and the  
24 counsel for you, correct?

25 A. Yes.

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1 Q. All right. "Then the sponsor  
2 can introduce the bill with the  
3 amendments."

4 That's Russell as well. Do  
5 you see that?

6 A. Yes.

7 Q. And Russell was the sponsor of  
8 the bill, correct?

9 A. Yes.

10 Q. All right. And then it says,  
11 "Dowe and White will speak to Russell  
12 this morning to get him to support the  
13 amendments."

14 Do you see that?

15 A. Yes.

16 Q. Who are Dowe and White?

17 A. Two Senators.

18 Q. Okay. Do you remember what  
19 happened from this point forward with  
20 the legislation?

21 A. No.

22 Q. All right. Do you remember  
23 what happened from this point forward  
24 with the legislation?

25 A. No.



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1 Q. Do you recall changing your  
2 mind about what you had said you would  
3 support?

4 A. I don't recall what happened  
5 after.

6 Q. I'm sorry. I couldn't hear  
7 that, sir.

8 A. I don't recall. It was 12  
9 years ago.

10 Q. Sure.

11 ATTORNEY NEIMAN: Let's take a  
12 look then at a document we'll mark as  
13 18? A document we'll mark as Exhibit  
14 17.

15 (Whereupon, Defendant's  
16 Exhibit No. 17, E-mail dated  
17 June 27, 2012, was marked for  
18 identification)

19 THE WITNESS: Thank you.

20 (BY ATTORNEY NEIMAN):

21 Q. All right. So, sir, if you  
22 take a look at Exhibit 17, it's  
23 another E-mail exchange between Ms. De  
24 Jongh and Mr. Epstein. Do you see  
25 that?

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1 say nothing is really a bit beyond the  
2 pale of acceptable behavior. He  
3 agreed."

4 Do you see that?

5 A. Yes.

6 Q. Do you recall having any  
7 discussion with either Ms. De Jongh or  
8 Mr. De Jongh about the fact that you  
9 had changed your mind, but hadn't  
10 given notice to them of that?

11 A. I don't recall.

12 Q. Do you recall Ms. -- ever  
13 agreeing with Ms. De Jongh that some  
14 behavior you had engaged in was beyond  
15 the pale?

16 ATTORNEY ACKERMAN: Objection  
17 to form.

18 THE WITNESS: I don't recall  
19 having a conversation with her about  
20 it.

21 (BY ATTORNEY NEIMAN):

22 Q. All right. Do you ever recall  
23 having any discussion with Mr. De  
24 Jongh about -- in this time period,  
25 June of 2012, related to the sex

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1 offender notification legislation?

2 A. I don't recall.

3 Q. Now let's just go back for a  
4 moment, if we could, sir, to tab -- to  
5 Exhibit 17, which was the text --

6 A. Oh.

7 Q. -- of the proposed -- one of  
8 the -- one of the proposed compromise  
9 that had the language about the  
10 Attorney General's discretion.

11 Do you see that?

12 ATTORNEY ACKERMAN: No, I  
13 don't -- I don't think you have the  
14 right exhibit number.

15 ATTORNEY NEIMAN: Oh.

16 ATTORNEY ACKERMAN: 15 maybe?

17 ATTORNEY NEIMAN: 15.

18 ATTORNEY NEIMAN: Oh, yeah.

19 You're right, Exhibit 15. I'm sorry.

20 (BY ATTORNEY NEIMAN):

21 Q. Do you have Exhibit 15 in  
22 front of you, sir?

23 A. Yes.

24 Q. And you can see that this was  
25 one of the proposals that we've

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1 broader knowledge from?

2 A. We research it.

3 Q. What did you do to research  
4 it?

5 A. I had my staff research it.

6 Q. What did they tell you?

7 A. What did they tell me?

8 Q. Yeah.

9 A. That he was an international  
10 financier, that he did -- he'd go all  
11 over the world. He did business,  
12 provided funding, gave financial  
13 advice and all of that nature of  
14 things that he did.

15 Q. Did the --

16 A. For the specific as to his  
17 day-to-day activity and a list of all  
18 that he does with these folks, no, I  
19 didn't have that, but I had enough to  
20 understand his business activity was  
21 one that he did a lot of traveling.

22 Q. Okay. Did the staff tell you  
23 that there were public reports of his  
24 abuse of more than 40 women?

25 A. At the time in 2012, 2011,

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1 report related to a July 15th, or July  
2 16th, 2015 visit to Mr. Epstein. Do  
3 you see that?

4 A. I'm sorry?

5 Q. I said this relates to a July  
6 2015 visit. Do you see that on the  
7 second page?

8 A. Yes.

9 Q. Were you still the Attorney  
10 General at this time?

11 A. No.

12 Q. Okay. When did you cease to  
13 be the Attorney General?

14 A. January of 2015.

15 Q. Did you ever hear that  
16 representatives of Mr. Epstein were  
17 denying access to Mr. Epstein's island  
18 to the monitors?

19 A. I never heard that.

20 Q. What would have been an  
21 appropriate response by the new  
22 Attorney General if they learned that  
23 Mr. Epstein's team was denying entry  
24 to the monitors?

25 ATTORNEY ACKERMAN: Objection

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1 to form.

2 THE WITNESS: What would be  
3 the response?

4 (BY ATTORNEY NEIMAN) :

5 Q. What would be an appropriate  
6 response?

7 ATTORNEY ACKERMAN: Objection  
8 to form.

9 THE WITNESS: I can -- I can  
10 say what I would do.

11 (BY ATTORNEY NEIMAN) :

12 Q. Yeah. What would you do?

13 A. What I would do is then we  
14 would have to take a more aggressive  
15 visit --

16 Q. I take it it would not --

17 A. -- that -- that allows even  
18 for the charge and filing of a  
19 complaint in the court --

20 Q. Okay.

21 A. -- if is persistent, ongoing.

22 Q. All right. Sir, can you tell  
23 us what you did to prepare for today's  
24 deposition?

25 A. I met with my counsel.

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1 Q. All right. Mr. Frazer, how  
2 long have you known Mr. De Jongh?

3 A. Personally since 2000- --  
4 2004.

5 ATTORNEY ACKERMAN: Make sure  
6 you keep your voice up.

7 THE WITNESS: Oh, I'm sorry.  
8 Yeah. Yeah, since about  
9 2004.

10 (BY ATTORNEY NEIMAN):

11 Q. And do you consider him a  
12 friend?

13 A. Yes.

14 Q. How did you become Attorney  
15 General?

16 A. He selected me.

17 Q. All right. And do you know  
18 why?

19 A. If I know why?

20 Q. Yes.

21 A. He knew me, and he had  
22 confidence in my judgment and my  
23 ability as a lawyer.

24 ATTORNEY NEIMAN: All right.  
25 I have no further questions for you at

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1 A. Yes.

2 Q. And so why did you do a  
3 cleanup of your personal E-mails?

4 A. When you're sitting there and  
5 with the E-mail, you're reminded you  
6 got 25,000 E-mails, and they go back  
7 over years, and you getting a notice  
8 to storage space needed. So I  
9 responded to that problem. I deleted  
10 everything that was necessary.

11 Q. All right. Thank you.

12 Attorney Frazer, during your  
13 tenure as Attorney General, did you  
14 ever grant special -- did you ever  
15 grant special treatment to Mr. Epstein  
16 because of his employment of Cecile de  
17 Jongh?

18 A. No.

19 Q. Did Mr. Epstein's employment  
20 of Cecile de Jongh ever factor into  
21 the decisions that you made regarding  
22 Mr. Epstein?

23 A. No.

24 Q. Did you ever make decisions  
25 with Mr. Ep- -- regarding Mr. Epstein



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1 in order to curry favor with the  
2 Governor?

3 A. No.

4 Q. When you were evaluating  
5 Mr. Epstein's counsel's request for  
6 waivers, did Mr. Epstein's employment  
7 of Cecile de Jongh factor into your  
8 decision at all?

9 A. No.

10 Q. Did Governor de Jongh's  
11 opinion of your actions with respect  
12 to those waivers factor into your  
13 decision at all?

14 A. His opinion, no.

15 Q. Let's talk about, a little bit  
16 about --

17 A. Can I?

18 Q. Yeah. Do you need to explain?  
19 Please explain.

20 A. Whatever -- one, I didn't --  
21 initially I didn't even know Cecile de  
22 Jongh worked for Epstein. So contrary  
23 to what many may believe, it was --  
24 it's not something that was widely  
25 known. I didn't know.

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1 A. Yes.

2 Q. And does this letter contain  
3 representations upon which you relied  
4 in exercising your discretion to make  
5 decisions regarding Mr. Epstein's  
6 notification requirements?

7 A. Yes.

8 Q. Okay.

9 A. This was included.

10 Q. Okay. I'm sorry. You said  
11 this was?

12 A. Included, yes.

13 Q. Okay. If you would turn,  
14 please, to page 2 of this letter --

15 A. Uh-huh.

16 Q. -- I want to direct your  
17 attention to the paragraph that begins  
18 first. It's the first full paragraph  
19 on that page.

20 A. Yes.

21 Q. Are you with me?

22 A. Yes.

23 Q. Okay. The second -- yes. The  
24 second sentence of that paragraph  
25 reads, "Mr. Epstein has followed the

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1 same procedure in the State of  
2 Florida, the very same jurisdiction of  
3 Mr. Epstein's conviction which gave  
4 rise to his registration requirement,  
5 where Mr. Epstein is permitted to  
6 provide E-mail notification of his  
7 arrival and departure."

8 Did I read that correctly?

9 A. Yes.

10 Q. And is that a representation  
11 upon which you relied in formulating  
12 your decision --

13 A. That representation --  
14 however, remember that I also had my  
15 staff to research the requirements  
16 from Florida and New York, the two  
17 particular jurisdictions that we were  
18 dealing with Epstein.

19 Q. Okay. And if you look at the  
20 next sentence, it reads, "Mr. Epstein  
21 provides E-mail notification to the  
22 State of New Mexico when he travels to  
23 and from his vacation home in that  
24 jurisdiction."

25 Did I read that correctly?